

## **REMARKS**

### **Drawings**

Thus, the Office Action points out that reference numbers 20-4 and 20-5 are used in the specification but not explicitly shown in the figures. For simplicity, the originally-filed Fig. 4 depicted only three of the five input event translators 20-1, 20-2, 20-3, 20-4, and 20-5 described for Fig. 4 in the specification as filed. The replacement Fig. 4 depicts all five event translators described in the application, including 20-4 and 20-5 and therefore addresses all drawing objections. No new matter is added, as the revised drawing matches the description given in paragraphs [0035], [0037], and [0038] appearing in the originally-filed application.

### **Anticipation Rejections**

The Office Action rejects claims 1-8 and 11-20 under 35 U.S.C. 102(b) as being anticipated by Leavitt (U.S. 2002/0085037). The rejected claims include explicit limitations to translating computer input events into translated input events according to user-defined translation behaviors. This allows, for example, a mouse click to be translated into a key press, or vice versa. In contrast, Leavitt teaches no more than allowing a user to define and arrange command buttons for a UDI (user defined interface) and program the actions taken in response to activation of those buttons. Leavitt provides no teachings whatsoever related to translating computer input events and, therefore, all anticipation rejections fail as a matter of law.

Put simply, Leavitt teaches that the response taken to a given input event (e.g., a touch screen input) can be programmed by a user. Leavitt offers no teachings related to translating input events into translated input events according to user-programmed behaviors, and then responding to the translated input event. More particularly, Leavitt presents a UDI that is meant to reduce "cursor commute." (See Abstract and Paragraph [0014], for example.) Leavitt lets users define user interface buttons and lets users define the program action(s) to be taken in

response to activating individual ones of those buttons. Thus, Leavitt teaches that users can define the program action taken when a given button is selected (e.g., clicked), but Leavitt offers no teachings in any way related to translating one computer input event into another computer input event.

Leavitt does not care how the user selects individual user interface buttons; rather Leavitt is concerned with allowing the user to arrange the buttons in a convenient on-screen arrangement, and is concerned with allowing the user to program what happens when a given button is selected. Leavitt does say that the buttons might be selectable by touch screen, or by steering wheel controls, or by rotary dials, etc. However, Leavitt does not teach translating a touch screen event into a steering wheel control event, for example, nor does Leavitt teach any other form of input event translation. Leavitt does not care how user interface buttons are selected.

In contrast, the instant application includes many examples of translating one input event into another input event. See Fig. 4 and its accompanying explanation, for example, where keyboard cursor key presses are translated into corresponding mouse input events and where MIDI (Musical Instrument Digital Interface) input commands are translated into keyboard key press input events. More importantly, all claims carefully include explicit limitations to computer input event translations, which are not taught by Leavitt.

Thus, in advancing the anticipation rejections in view of Leavitt, the Patent Office either is ignoring Applicant's claim language or is engaging in unlawful and unsupported claim construction. For example, claim 1 in its entirety reads:

1. A computer readable medium storing a computer program comprising:  
program instructions to create event translators that translate incoming input events into translated input events according to user-defined translation behaviors;

program instructions to enable a user to associate each event translator with a type of incoming input event; and  
program instructions to enable a user to configure a translation behavior for each event translator such that it generates a desired translated input event responsive to receiving an incoming input event of the type of incoming input event associated with the event translator.

(Emphasis added.)

Against these limitations, the Office Action at p. 3 alleges that Leavitt (page 2, paragraph 16) teaches “a. a plurality of buttons “inputs” which translate the events and have assigned commands defined by the user,” “b. a pointing device to activate an event associated with the buttons,” and “the ability to associate items on a steering wheel, rotary dials, etc. with the buttons. (Page 5, Paragraph 75).”

First, the plurality of input buttons taught by Leavitt do not translate input events, they simply act as targets for pre-defined input events. What the user gets to program is the action taken in response to the button being pressed. Second, the pointing device to activate an event associated with the buttons simply is the cursor or input controller that the user uses to actuate the buttons. Third, the ability to associate items on a steering wheel, rotary dials, etc. with the buttons is specifically described in Leavitt at Paragraph 75 as no more than the ability to have, in the alternative, various ways of selecting buttons defined by the UDI of Leavitt, including steering wheel controls, rotary dial controls, touch screen controls.

Applicant reminds the Patent Office that findings of anticipation must satisfy a high legal bar, in that the allegedly-anticipating reference must disclose each and every limitation of the invention as claimed, and must disclose the invention in the identical arrangement as claimed. Leavitt does not once teach, suggest, or even hint at translating input events. He is incorrect to argue that the ability of a user to program or change the action taken in response to a given

input event is the same as translating that given input event into another input event. Further still, Leavitt does not teach, suggest, or even hint at enabling users to configure input event translation behaviors for event translators and associate those configured input event translators with specific input events.

As such, Leavitt cannot anticipate independent claims 1 nor 11 (which includes essentially the same limitations as claim 1), nor any of their dependent claims, as a matter of law. Applicant respectfully requests that all anticipation rejections based on Leavitt be withdrawn.

#### Obviousness Rejections

The Patent Office rejects claims 9 and 10 under 35 U.S.C. 103(a) as being obvious in view of Leavitt standing alone. As a first point, claims 9 and 10 depend from claim 1, which patentably defines over Leavitt, and on that basis alone the obviousness rejections fail.

Further, claim 9 is directed to computer program instructions to display a graphical user interface that allows a user to graphically define input event translators, and link selected incoming input events to translated input events through the defined input event translators. Building on those details, claim 10 is directed to computer program instructions that provide visual depictions of available incoming input event types, and drag-n-drop capabilities, allowing the user to conveniently map input events to translated input events through the defined event translators.

The obviousness rejection concedes that Leavitt does not teach graphically connecting “events,” but argues that Leavitt teaches effectively the same thing by way of a text interface and that it would have been obvious to do the same thing via a graphical interface. The proffered motivation is to allow users to readily visualize “the command they would like to incorporate.”

Whether the use of graphical user interfaces in general is obvious or not is not a play here. What the obviousness rejection arguments miss entirely is that claims 9 and 10 include graphical user interface details specifically tied to the operations of selecting input events to be translated, configuring event translators to translate those selected input event types, and graphically tying the selected input events to translated input events to establish the desired translation behavior.

Leavitt teaches none of those underlying actions or functions and it is thus immaterial to the patentability of claims 9 and 10, or any other of the claims presented by Applicant, as to whether Leavitt might or could use a graphical user interface to accomplish Leavitt's teachings. Leavitt's invention is not the invention claimed by Applicant—frankly, it is not even related to the invention claimed by Applicant—so postulating that it would be obvious to accomplish graphically what Leavitt teaches accomplishing textually is not a legally sufficient basis for alleging obviousness of claims 9 and 10. For this further reason, Applicant respectfully requests that the obviousness rejections be withdrawn.

#### Conclusion

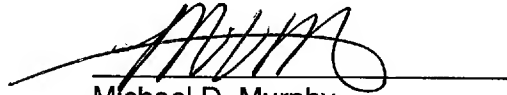
Leavitt fails as an anticipating reference because it offers no teachings related to translating input events into translated input events. The Office Action either ignores the explicit language of Applicant's claims, or misconstrues that language. Either way, the anticipation rejections, and the related obviousness rejections fail as a matter of law.

With those points in mind, and with the drawing corrections submitted herewith, Applicant believes that the instant application stands in condition for immediate allowance. As

such, Applicant looks forward to the Office's next correspondence on this matter.

Respectfully submitted,

COATS & BENNETT, P.L.L.C.

A handwritten signature in black ink, appearing to read 'M. Murphy', is written over a horizontal line.

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